

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Phyllice J. Jackson aka Phyllice
Freeman aka Phyllice Anthony aka
Phyllis Freeman aka Phyllis Jackson
aka Phyllis Anthony
Debtor

Fay Servicing, LLC as servicer for
Metropolitan Life Insurance Company

v.

Phyllice J. Jackson aka Phyllice
Freeman aka Phyllice Anthony aka
Phyllis Freeman aka Phyllis Jackson
aka Phyllis Anthony
Kenneth E. West
Respondents

CASE NO.: 20-11639-amc

CHAPTER 13

Judge: Ashely M. Chan

Hearing Date: March 4, 2025 at 11:00 a.m.

Objection Deadline: February 21, 2025

NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY

PLEASE TAKE NOTICE, that Fay Servicing, LLC as servicer for Metropolitan Life Insurance Company (on behalf of itself and together with any successor and/or assign “Movant”), filed a Motion for Relief from the Automatic Stay pursuant to 11 U.S.C. § 362 (d)(1) and (d)(2); vacating the automatic stay to permit Movant, its successors and/or assigns, to enforce its mortgage on the Debtor’s premises located at 1502 Walnut Ridge Estate, Pottstown, PA 19464.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before February 21, 2025 you or your attorney must do all of the following:

- (a) file an answer explaining your position at

United States Bankruptcy Court
Eastern District of Pennsylvania
900 Market Street
Suite 204
Robert N.C. Nix Sr. Federal Courthouse, Courtroom 4
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- (b) mail a copy to the Movant's attorney:

Lauren Moyer
Friedman Vartolo, LLP
1325 Franklin Avenue, Suite 160
Garden City, NY 11530
Phone: (212) 471-5100
Fax: (212) 471-5150
Bankruptcy@FriedmanVartolo.com

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Judge Ashely M. Chan at 900 Market Street, Suite 204, Robert N.C. Nix Sr. Federal Courthouse, Courtroom 4, Philadelphia, PA 19107 on March 4, 2025 at 11:00 a.m., unless otherwise ordered by the Court.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at (215) 408-2800 to find out whether the hearing has been canceled because no one filed an answer.

Dated: February 7, 2025

By: /s/ Lauren Moyer

Lauren Moyer, Esq.

FRIEDMAN VARTOLO LLP

Attorneys for Fay Servicing, LLC as servicer for
Metropolitan Life Insurance Company

1325 Franklin Avenue, Suite 160

Garden City, NY 11530

T: (212) 471-5100

F: (212) 471-5150

Bankruptcy@FriedmanVartolo.com

TO:

Phyllice J. Jackson aka Phyllice Freeman aka Phyllice Anthony aka Phyllis Freeman aka Phyllis Jackson aka Phyllis Anthony

1502 Walnut Ridge Estates

Pottstown, PA 19464

Bankruptcy Debtor

Joseph Quinn, Esq.

192 S. Hanover Street, Suite 101

Pottstown, PA 19464

Attorney

Kenneth E. West

190 N. Independence Mall West, Suite 701

Philadelphia, PA 19106

Bankruptcy Trustee

United States Trustee

Robert N.C. Nix Federal Building - Suite 320, 900 Market Street

Philadelphia, PA 19107

United States Trustee